

Random Moment Time Study (RMTS)

Helpful Reminders for Beginning FFY 2021

As you prepare to start another year, Health and Human Services Commission (HHSC) would like to remind you to complete the following to make your job easier and ensure compliance with RMTS requirements.

1. COVID-19 and RMTS

As we collectively continue to navigate through the COVID-19 pandemic, we wanted to provide you an update regarding the impact to the school-based Medicaid programs, and more specifically, the Random Moment Time Study (RMTS). We recognize there are many open questions regarding program requirements, including RMTS completion and compliance. This information is intended to provide guidance to RMTS Contacts and sampled Time Study participants.

Although many Texas schools and facilities buildings are closed, we recognize that most staff continue to work remotely and are still providing educational as well as health-related services. For any staff that are continuing to work (regardless of location), if they have been sampled for a moment, they should respond to the moment with what they were doing within the 5-business day response period. If sampled participants need assistance accessing or completing their RMTS moment, we encourage them to call the Fairbanks Client Information Center directly at 888-321-1225. For those staff members that are not working, as a RMTS Contact, you will continue to have the ability to mark any moments as Paid or Unpaid Leave via the Time Study Sample page of Fairbanks system.

Fairbanks is committed to ensuring our participating school districts continue to receive all the eligible reimbursement you are entitled for both the Administrative Claiming and Direct Services reimbursement programs. We will continue to partner with Health and Human Services Commission in monitoring the impact to these programs during this unforeseen challenge as well as coordinate efforts in requesting formalized policy guidance from the federal government. As we continue to learn more, we will provide ongoing updates regarding any changes to program or policy guidelines.

While we await the beginning of the 1st quarter time study period, beginning on October 1st, we want to continue to offer guidance to assist you during this time.

The RMTS Contact has the ability to identify staff who will be selected for a "moment" before the moment occurs. **The RMTS Contact will need to:**

- a. Log into STAIRS and go to the "Time Study Sample" tab.
- b. Next, select the current quarter (October – December).
- c. After selecting the current quarter, select the participant(s) who will not be able to respond to their moment during this time span.
- d. After the participant(s) have been identified and selected, click on the "paid" or "unpaid" leave button. You will not have to wait for their moment to occur in order to respond to a moment. Your input will take effect immediately.

If or when your district reopens and resumes to their regular duties, please have the participants respond to their RMTS "moment" as they normally would when selected for a moment.

2. Administrative Staff excluded from the Participant List

The time study guide, approved by Centers for Medicare and Medicaid Services (CMS) on April 25, 2007, states:

Administrative staff, such as executive directors, program directors, principals, assistant principals, special education directors, and other managers/supervisory staff are not to be included in the time study. Likewise, there should be no clerical or administrative support staff included. These staff will be included in the claiming process by allocating their time and appropriate costs based on the total time study effort.

HHSC does not have a CMS exemption from this requirement.

Therefore, to maintain compliance with the CMS-approved time study guide, independent school districts (ISDs) participating in the School and Health Related Services (SHARS) and Medicaid Administrative Claiming (MAC) programs must exclude these staff from their quarterly time study participant lists and cost pools for their annual cost reports. HHSC expects all SHARS and MAC ISDs to be fully compliant with this requirement in federal fiscal year 2021.

3. Updating RMTS contact information in State of Texas Automated Information Reporting System (STAIRS)

- a. Delete any old contacts that are no longer with your entity. Review and update job titles and designated roles.
- b. Ensure e-mail addresses are current
- c. Ensure accuracy of physical addresses and phone numbers with extensions for all contacts.

4. Important Information about RMTS Contacts

It is very important you ensure your Primary RMTS contact is an employee of the entity and not an employee of your Shared Services Agreement (SSA), Co-op or vendor.

- a. It is out of compliance for SSA, Co-op and vendor employees to be listed as the Primary RMTS Contact but it is permitted that they be listed as Secondary Contacts.
- b. All logon information is personal and confidential and should **never** be shared or delegated to anyone. Failure to comply with this requirement could affect the district's eligibility to participate in the RMTS.

5. New Hires

If you are new and this is your first year to participate in SHARS and/or MAC

- a. Contact the HHSC Time Study unit (Timestudy@hhsc.state.tx.us) to receive the form necessary to set up your entity in STAIRS.
- b. Log on to HHSC website and ensure someone (preferably two) from your entity registers for initial RMTS training as soon as possible.

<https://rad.hhs.texas.gov/time-study/time-study-independent-school-districts-isd>

6. Clarification of personal care services

- a. Personal care services include a range of human assistance provided to students to accomplish activities of daily living (ADLs) or instrumental activities of daily living (IADLs) the student would normally do for themselves if they did not have a disability.
 - i. Examples of ADLs
 - Bathing
 - Eating
 - Going to the toilet
 - Dressing
 - Walking
 - ii. Examples of IADLs
 - Laundry
 - Light housework
 - Fixing meals

7. Participant List Oversight/Monitoring

- a. Vacant Positions
 - i. Only the vacant position(s) the district anticipates filling during the quarter should be included on the PL
 - ii. Should be reviewed and edited each quarter before the PL closes
 - iii. Loading the PL with vacant positions limits the opportunity for the selected moment to be a reimbursable response
 - iv. RMTS Contact responds to the moment as paid/unpaid leave

- v. Excess ultimately lowers the RMTS percentage across the State
- b. Duplicate Positions
 - i. Identify and remove from PL
 - ii. If more than one job function is performed by the participant, only include it once on the PL in the category/function performed majority of the time
 - iii. An email will be sent to those districts identified as having possible duplicate entries
 - iv. HHSC trained RMTS Contact will be responsible for removing duplicate entries prior to the PL close date

If you have any questions or concerns, you may contact **HHSC Time Study Unit** at **(512) 490-3194** or email timestudy@hhsc.state.tx.us. You can also contact Fairbanks Client Information Center at 888-321-1225 for any questions you may have.